



April 10, 2023

Ms. Elizabeth Cordial
Director of State Board Relations
Colorado Department of Education
1025 Ninth Ave.
Greeley, CO 80631

RE: Opposition and Amendments to Assistant Regulations

Dear Ms. Cordial:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write in continued opposition to the proposed regulations regarding the emergency authorization for those who have not yet completed their speech-language pathology assistant (SLPA) requirements. ASHA also recommends amending the requirements for assistant supervisors and for portions of the scope of practice for SLPAs.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Speech-language pathologists identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders. Over 4,300 ASHA members reside in Colorado.¹

ASHA maintains its recommendation for deleting the emergency authorization for SLPAs under Section 4.03., which allows the assistant to practice while only holding a bachelor's degree in speech, language, and hearing sciences; communications disorders speech sciences; or any other field with completion of 24 semester hours in speech, language, hearing sciences from an accepted institution of higher education. ASHA has additional concerns about 4.03(2) allowing this authorization to be issued for one year with the possibility of being continued for an additional year.

Under the current regulations (Section 4.11) for SLPAs, practitioners must hold a) a bachelor's degree in speech communication, speech-language pathology, communication disorders, or speech sciences or b) a bachelor's degree in any other field with completion of 24 semester hours in speech language hearing sciences from an accepted institution of higher education, have successfully completed a minimum of 100 clock hours of a school-based practicum, are under the supervision of an ASHA certified and licensed school speech-language pathologist (SLP), and have demonstrated knowledge and skills in the required competencies. **ASHA maintains that the existing competencies required under the current regulations for assistants, along with the required supervision, are critical in protecting the children that they serve.**

We also understand from an October 4, 2022, memo from the U.S. Department of Education regarding "Personnel Qualifications Under Part B of the Individuals with Disabilities Education (IDEA) Act," that the Colorado emergency authorization language appears to be inconsistent with the IDEA requirements. This memo specifically states that "related services personnel who deliver services in their discipline or profession **may not** have certification or licensure requirements waived on an emergency, temporary, or provisional basis."

ASHA continues to recommend clarifications be issued around the supervising SLP qualifications in Section 4.11(1)(c). In addition to being ASHA certified and licensed, the supervising SLP should complete two hours of professional development in the area of supervision and have had at least nine months of full-time practice experience after being awarded the ASHA Certificate of Clinical Competence (CCC).

ASHA appreciates the consideration given to its previously submitted recommendations, some of which have been included in the proposed SLPA scope of practice language.

ASHA again recommends further changes (in bold) to the proposed language addressing telepractice in Section 4.11 (3)(1):

“provide services via telepractice to students, **patients, and clients** as directed by the supervising SLP.”

ASHA also recommends the following new language in Section 4.11(4)(a):

“assist the SLP during assessment of students, **patients, and clients** (e.g., setting up the testing environment, gathering and prepping materials, taking notes as advised by the SLP, etc.).”

ASHA also recommends adding the following new language under the SLPA scope of practice in Section 4.11(6):

4.11(6)(c) Provide caregiver coaching (e.g., model and teach communication strategies, provide feedback regarding caregiver-child interactions) for facilitation and carryover of skills and

4.11 (6)(d) Demonstrate strategies included in the feeding and swallowing plan developed by the SLP and share information with students, patients, clients, families, staff, and caregivers.

Thank you for considering ASHA’s proposed changes to the speech-language pathology assistant regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA’s director of state association relations, at ecrowe@asha.org.

Sincerely,



Robert M. Augustine, PhD, CCC-SLP
2023 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *Colorado* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-fliers/colorado-state-flyer.pdf>.